

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Lifeline and Link Up Reform and
Modernization

Lifeline and Link-Up

Federal-State Joint Board on Universal
Service

Advancing Broadband Availability Through
Digital Literacy Training

WC Docket No. 11-42

WC Docket No. 03-109

CC Docket No. 96-45

WC Docket No. 12-23

**REQUEST FOR EXTENSION OF TIME
OF THE CALIFORNIA PUBLIC UTILITIES COMMISSION
AND THE PEOPLE OF THE STATE OF CALIFORNIA TO OPT OUT OF
NATIONAL LIFELINE ACCOUNTABILITY DATABASE**

The California Public Utilities Commission and the People of the State of California (CPUC or California) respectfully request an extension of time to submit an opt-out request with regard to the National Lifeline Accountability Database (National Database). On November 14, 2012, the Federal Communications Commission (FCC or the Commission) released a public notice (PN)¹ setting December 1, 2012² as the

¹ DA 12-1624

² In the *Lifeline Reform Order*, the Commission set the opt-out filing deadline to November 1, 2012. However, in the PN, the Commission granted a limited waiver and extended the deadline from November 1, 2012 to December 1, 2012.

deadline by which states must file their opt-out request with the Commission.

In the *Lifeline Reform Order*,³ the FCC made a number of significant reforms to the federal lifeline program to prevent waste, fraud and abuse. One of the reforms is the establishment of the National Database. The purpose of the National Database is to detect and eliminate duplicative lifeline support provided to eligible persons. The National database will perform a number of key functions, including: 1) housing subscriber data provided by eligible telecommunications carriers (ETCs); 2) receiving and processing subscriber information; and 3) allowing ETCs to query the National Database prior to signing up eligible persons/households to see if they are already receiving lifeline support.⁴

Because some states, however, have their own systems for eliminating duplicate lifeline support, the Commission is allowing those states to either participate in the National Database or to opt-out of the National Database and continue using their own system. If a state choose the latter option, the FCC requires the states to submit a request by December 1, 2012.

California has a comprehensive system that checks for lifeline duplicates and is therefore planning to opt-out of the National Database. Accordingly, the CPUC requests a 30-day extension of time (from December 1, 2012 to December 31, 2012) to file an opt-out request. Currently, we are experiencing a significant shortage in staff resources. We

³ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*; WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23; (FCC 12-11); Report and Order; rel. February 6, 2012 (*Lifeline Reform Order*).

⁴ *LifeLine Reform Order* at para. 179.

also recently changed to a new third-party lifeline administrator, who is currently administering over 1.6 million customers in California. We therefore respectfully request an additional 30 days to submit an opt-out request.

Respectfully submitted,

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